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UNITED STATES
BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEVADA
PATRICIA SMITH
CLERK

1 WILDE & ASSOCIATES
2 GREGORY L. WILDE, ESQ.
3 Nevada Bar No. 004417
4 NARRAH F. NEWARK, ESQ.
5 Nevada Bar No. 008201
6 208 South Jones Boulevard
7 Las Vegas, Nevada 89107
8 Telephone: (702) 258-8200
9

10 UNITED STATES BANKRUPTCY COURT
11 SOUTHERN DISTRICT OF NEVADA
12

13 In re:

BK-S-04-12740-vj

14 JAMES GORDON GRITZ,

Chapter 7

15 Debtor.

ADV. NO. _____

16 THOMAS W. WILKINSON, THOMAS W.
17 WILKINSON, PPA Benjamin Wilkinson
18 Wiegand, THOMAS W. WILKINSON, PPA
19 Jonathon Wiegand, and KAREN
20 WILKINSON,

Date: Sept. 27, 2004

Time: 1:30

21 Plaintiffs,

22 v.

23 JAMES GORDON GRITZ

24 Defendants.

25 **COMPLAINT TO DETERMINE DEBT NON-DISCHARGEABLE PURSUANT TO 11**
26 **U.S.C. SECTION 523(a)(2)(A) and 11 U.S.C. SECTION 523(a)(2)(C)**

27 Plaintiffs, THOMAS W. WILKINSON, THOMAS W. WILKINSON, PPA Benjamin
28 Wilkinson Wiegand, THOMAS W. WILKINSON, PPA Jonathon Wiegand and KAREN
29 WILKINSON, by and through their attorneys of record, WILDE & ASSOCIATES complains of the
30 above-named Defendant James Gordon Gritz and alleges as follows:

31 ///

32 ///

SCANNED

WILDE & ASSOCIATES
208 South Jones Boulevard
Las Vegas, Nevada 89107
(702) 258-8200 - Fax 258-8787

STATEMENT OF JURISDICTION

1. This is a core proceeding over which this Court has jurisdiction pursuant to 28 U.S.C. Section 1334, 157(a) & 57(b)(2)(I) and venue is appropriate pursuant to 28 U.S.C. Section 1409(a).

2. This Chapter 7 case was commenced on or about March 17, 2004, by the filing of a Voluntary Petition by the above-named Debtor/Defendant ("Defendant"), Bankruptcy Case No. 04-12740-VJ.

3. Defendant is an individual.

4. Plaintiffs are creditors of Defendant.

5. This is an adversary proceeding to determine the dischargeability of a debt.

FIRST CLAIM FOR RELIEF

(To Determine Dischargeability of Debt Pursuant to 11 U.S.C. Section 523(a)(6))

6. On or about September 23, 1992, Plaintiff Thomas Wilkinson instituted an action in Connecticut to dissolve his marriage to one Linda Wiegand.

7. On January 27, 1995, the Court officially dissolved the marriage between Wilkinson and Wiegand. The Court further awarded custody of two minor children, namely Benjamin Wilkinson Wiegand and Jonathan Wiegand, to Thomas Wilkinson.

8. On or about October 1, 1996, Debtor / Defendant James "Bo" Gritz traveled to the State of Connecticut with the intent of securing national media attention and assisting Linda Wiegand in obtaining custody of the children, by means other than through proper court action.

9. To secure national attention, Debtor / Defendant assisted Linda Wiegand in publishing accusations against Thomas Wilkinson and Karen Wilkinson, sister to Thomas. These accusations included, but were not limited to, alleging that Thomas Wilkinson and Karen Wilkinson engaged in pedophilia and Satanism.

10. That Debtor / Defendant was or is a founder of a group known as "Center for Action."

11. The Center for Action did or does publish a monthly newsletter.

12. In October 1996, the Center for Action's Monthly Newsletter published an Article.

1 This Article contained many false and fabricated horrific allegations against Thomas Wilkinson and
2 Karen Wilkinson.

3 13. The article stated that Thomas Wilkinson was raping his two young sons, whom at the
4 the time were respectively a mere seven (7) and four (4) years old. That Thomas Wilkinson required
5 the young boys to perform other graphic sex acts and that his sister, Karen Wilkinson, "prayed to the
6 Devil."

7 14. Debtor / Defendant caused a news release to be published in late September or early
8 October that accused Karen Wilkinson of being a convicted pedophile, being on the National register
9 of Sex Offenders, and that she lived with her brother Thomas Wilkinson, and three other men that
10 have a relationship with a Satanic Cult.

11 15. Debtor / Defendant had or has a radio program entitled "Freedom Calls" on the Talk
12 America Radio Network, based in Canton, Massachusetts.

13 16. Debtor / Defendant as host willfully, knowingly and with intent to defame
14 participated in broadcasting horrific and derogatory statements about Thomas Wilkinson and Karen
15 Wilkinson.

16 17. On or about November 8, 1996, Debtor / Defendant caused to be published on the
17 Internet, an article entitled, "Bo Gritz and Linda Wiegand - - What Happened"

18 18. Debtor / Defendant in the above article stated that "four year old Ben was being
19 sexually abused" by Thomas Wilkinson.

20 19. Debtor / Defendant in the above article also stated that the two boys were in the
21 custody of Thomas Wilkinson and Karen Wilkinson, whom he stated sodomized, raped, threatened
22 and abused the two boys.

23 20. Debtor / Defendant on many other occasions made horrific and baseless allegations
24 against Thomas Wilkinson and Karen Wilkinson in numerous mediums.

25 21.. On or about January 21, 1997, Plaintiff filed an action against Debtor/Defendant
26 James "Bo" Gritz in the Judicial District of Hartford, State of Connecticut.

22. The Complaint alleged numerous counts of Libel and Slander against Debtor / Defendant, as well as Invasion of Privacy and Intentional Infliction of Emotional Distress.

23. On or about April 5, 2002, Superior Court, for the Judicial District of Hartford, in the State of Connecticut, granted the Wilkinsons' Motion for Judgment upon default and thereafter assigned a hearing to determine damages.

24. On or about September 11, 2002, Superior Court, for the Judicial District of Hartford, in the State of Connecticut, awarded Thomas W. Wilkinson Four Million Dollars (\$4,000,000.00), along with interest in the amount of \$2,564,324.99, for a total of \$6,564,324.99.

25. On or about September 11, 2002, Superior Court, for the Judicial District of Hartford, in the State of Connecticut, further awarded, Thomas W. Wilkinson, PPA for Benjamin Wilkinson Wiegand Four Million Dollars (\$4,000,000.00), along with interest in the amount of \$2,564,324.99, for a total of \$6,564,324.99.

26. On or about September 11, 2002, Superior Court, for the Judicial District of Hartford, in the State of Connecticut, further awarded Thomas W. Wilkinson, PPA for Jonathon Wiegand Four Million Dollars (\$4,000,000.00), along with interest in the amount of \$2,564,324.99, for a total of \$6,564,324.99.

27. On or about September 11, 2002, Superior Court, for the Judicial District of Hartford, in the State of Connecticut, further awarded Karen Wilkinson Two Million Dollars (\$2,000,000.00), along with interest in the amount of \$1,353,204.49, for a total of \$3,353,204.49.

28. A true and correct copy of the Judgment from the State of Connecticut, Superior Court, Judicial District of Hartford, Case No. CV 97-0567607 is attached hereto as Exhibit "1."

29. The \$20,046,179.46 debt owed by Debtor / Defendant to Plaintiffs is nondischargeable under Bankruptcy Code Section 523(a)(6).

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

1. That the Court determine that the debt owed Plaintiffs by Defendant in the sum of \$20,046,179.46, is nondischargeable pursuant to 11 U.S.C. Section 523(a)(6);

2. For attorney's fees and costs incurred;
3. For interest on the debt at the legal rate of interest; and,
4. For such other and further relief as the Court may deem proper.

DATED this 22nd day of June, 2004.

WILDE & ASSOCIATES

By 

GREGORY L. WILDE, ESQ.

Nevada Bar #4417

NARRAH F. NEWARK, ESQ.

Nevada Bar #8201

208 South Jones Boulevard

Las Vegas, Nevada 89107

Attorneys for Plaintiff

WILDE & ASSOCIATES
208 South Jones Boulevard
Las Vegas, Nevada 89107
(702) 258-8300 - Fax 258-8787

WILDE & ASSOCIATES
208 South Jones Boulevard
Las Vegas, Nevada 89107
(702) 258-8200 - Fax 258-8787

EXHIBIT 1

STATE OF CONNECTICUT

NO.CV 97-0567607

SUPERIOR COURT

THOMAS W. WILKINSON
of 670 East Street South, Suffield, Connecticut, 06078
Thomas W. Wilkinson, PPA Benjamin Wilkinson Wiegand,
of 670 East Street South, Suffield, Connecticut 06078
Thomas W. Wilkinson, PPA Jonathan Wiegand,
of 670 East Street South, Suffield, Connecticut 06078 and
Karen Wilkinson of 36 Flower Road, Hopewell Junction, NY 12533

JUDICIAL DISTRICT

Hartford

VS.

AT Hartford

JAMES "BO" GRITZ
HCR 37, Box 472 Sandy Valley, NV 89019

September 11, 2002

Present: Hon. Henry Cohn, Judge

JUDGMENT

This action, by writ and complaint claiming money damages, came to this Court on February 25, 1997 and thence to April 5, 2002 when the court, (Aurigemma, J) granted plaintiffs' motion for judgment upon default and that the mater be assigned to a hearing in damages, and thence to the present time when the court held a hearing on damages.

The Court, having heard the plaintiff finds the issues for the plaintiffs.

Whereupon, it is adjudged that the plaintiff Thomas W. Wilkinson, recover Four (\$4,000,000.00) million dollars of the defendant,

OFFICE OF THE CLERK
SUPERIOR COURT
JUDICIAL DISTRICT OF
HARTFORD
STATE OF CONNECTICUT

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It is further adjudged that the plaintiff Thomas W. Wilkinson, PPA for Benjamin Wilkinson Wiegand, recover Four (\$4,000,000.00) Million Dollars of the defendant; and

It is further adjudged that the plaintiff Thomas W. Wilkinson, PPA for Jonathan Wiegand, recover of the defendant, Four (\$4,000,000.00) Million Dollars and

It is further adjudged that the plaintiff Karen Wilkinson recover of the defendant TWO (\$2,000,000.00) Million Dollars

THE COURT, having examined the record determines that the plaintiffs filed an offer of judgment on April 16, 1997 which the defendant failed to accept. The court finds that the plaintiffs filed this ~~his~~ offer of judgment not later than eighteen months from the filing of such complaint and awards, in accordance with Section 52-192a of the Connecticut General Statutes, twelve percent annual interest on said amount less attorney's fees from January 21, 1997.

Therefore the court awards the sum of \$2,564,324.99 as interest to each judgment in favor of Thomas Wilkinson, Benjamin Wilkinson Wiegand and Jonathan Wiegand and the sum of \$1,353,204.49 as interest to the judgment in favor of Karen Wilkinson.

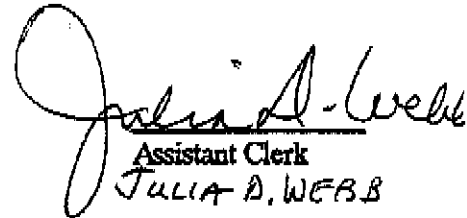
The total of the judgment as to Thomas W. Wilkinson is therefore Six Million five hundred, sixty four thousand dollars and 99 cents (\$6,564,324.99)

The total of the judgment as to Thomas W. Wilkinson, PPA Benjamin Wilkinson Wiegand is therefore Six Million five hundred and sixty four thousand dollars and 99 cents (\$6,564,324.99).

The total of the judgment as to Thomas W. Wilkinson, PPA Jonathan Wiegand, is Six Million five hundred and sixty four thousand dollars and 99 cents (\$6,564,324.99).

The total of the judgment as to Karen Wilkinson is Three million three hundred fifty three

thousand two hundred four dollars and 49 cents (\$ 3,353,204.49).


Assistant Clerk
JULIA D. WEBB

B104 (Rev. 8/87)		ADVERSARY PROCEEDING COVER SHEET (Instructions on Reverse)		Adversary Proceeding Number (Court Use Only)	
PLAINTIFFS THOMAS W. WILKINSON, THOMAS W. WILKINSON, PPA Benjamin Wilkinson Wiegand, THOMAS W. WILKINSON, PPA Jonathon Wiegand, and KAREN WILKINSON,		DEFENDANTS JAMES GORDON GRITZ,			
ATTORNEYS (Firm Name, Address, and Telephone No.) WILDE & ASSOCIATES Gregory L. Wilde, Esq. 208 South Jones Blvd. Las Vegas, NV 89107 (702) 258-8200		ATTORNEYS (If Known) George Carter, Esq. 1630 East Sahara Las Vegas, Nevada 89104			
PARTY (Check one box only) <input type="checkbox"/> 1 U.S. PLAINTIFF <input type="checkbox"/> 2 U.S. DEFENDANT <input checked="" type="checkbox"/> 3 U.S. NOT A PARTY					
CAUSE OF ACTION (WRITE A BRIEF STATEMENT OF CAUSE OF ACTION, INCLUDING ALL U.S. STATUTES INVOLVED) Complaint to to determine the dischargeability of a debt 11 U.S.C. § 523.					
NATURE OF SUIT (Check the one most appropriate box only.)					
<input type="checkbox"/> 454 To Recover Money or Property <input checked="" type="checkbox"/> 435 To Determine Validity, Priority, or Extent of a Lien or Other Interest in Property <input type="checkbox"/> 458 To obtain approval for the sale of both the interest of the estate and of a co-owner in property <input type="checkbox"/> 424 To object or to revoke a discharge 11 U.S.C. § 727		<input type="checkbox"/> 455 To revoke an order of confirmation of a Chap. 11 or Chap. 13 Plan <input checked="" type="checkbox"/> 426 To determine the dischargeability of a debt 11 U.S.C. § 523 <input type="checkbox"/> 434 To obtain an injunction or other equitable relief <input type="checkbox"/> 457 To subordinate any allowed claim or interest except where such subordination is provided in a plan		<input type="checkbox"/> 456 To obtain a declaratory judgment relating to any of foregoing causes of action <input type="checkbox"/> 459 To determine a claim or cause of action removed to a bankruptcy court <input type="checkbox"/> 498 Other (specify)	
ORIGIN OF PROCEEDINGS (Check one box only.)	<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed Proceeding	<input type="checkbox"/> 4 Reinstated or Reopened	<input type="checkbox"/> 5 Transferred from Another Bankruptcy Court	<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23
DEMAND	NEAREST THOUSAND \$	OTHER RELIEF SOUGHT Quiet Title			<input type="checkbox"/> JURY DEMAND
BANKRUPTCY CASE IN WHICH THIS ADVERSARY PROCEEDING ARISES					
NAME OF DEBTOR JAMES GORDON GRITZ			BANKRUPTCY CASE NO. BK-S-04-12740		
DISTRICT IN WHICH CASE IS PENDING NEVADA		DIVISIONAL OFFICE Las Vegas		NAME OF JUDGE VJ	
RELATED ADVERSARY PROCEEDING (IF ANY)					
PLAINTIFF		DEFENDANT		ADVERSARY PROCEEDING NO.	
DISTRICT		DIVISIONAL OFFICE		NAME OF JUDGE	
FILING FEE (Check one box only.)			<input checked="" type="checkbox"/> FEE ATTACHED	<input type="checkbox"/> FEE NOT REQUIRED	<input type="checkbox"/> FEE IS DEFERRED
DATE 6/24/04	PRINT NAME Narrah F. Newark, Esq.		SIGNATURE OF ATTORNEY (OR PLAINTIFF) 